

California Department of Insurance
Underwritten Title Company Data Call
Issued August 22, 2005 and Revised September 15, 2005

Questions and Answers

Please review the following information to answer your questions about the underwritten title company data call. These questions and answers should be used in combination with the September 15, 2005 revision of the reporting instructions for the data call.

The questions and answers are organized in three categories – general instructions, Table 1 and Table 2. Click on each question to get to our response to the question.

General Instructions

- [Question 1:](#) Can we get an extension? Will you extend the due date?
- [Question 2:](#) Has the DOI adopted any regulations under Section 12414.21?
- [Question 3:](#) Isn't the adoption of rules or regulations under Section 12414.21 a prerequisite for a data call under that section?
- [Question 4:](#) Prior to the data call did the DOI compile the information provided in the UTC annual audited financial reports submitted to the DOI?
- [Question 5:](#) Why can't the DOI get the information it needs from the annual reports?
- [Question 6:](#) Will the data submissions be treated as public information?

Table 1

- [Question 7:](#) On Table 1, are we to list each Title Order Transaction individually, or are we to state the total number of transactions? Are you looking for a summary of orders closed by Type i.e.. 500 residential resales or do you want a list of individual orders?
- [Question 8:](#) In Table 1, Column 1, Name of UTC, does this mean you want us to report by our different underwritten title companies or by our underwriters?
- [Question 9:](#) In Table 1, Column 2, County, does this mean you want the activity for our branches that are located in a certain county or do you want you the report broken down by the County the property was located in?
- [Question 10:](#) The Department indicates that in Table 1, Column 2, "County," refers to the county in which the property, that is the subject of the title search or escrow, is located. We do not track this information. We track our title and escrow orders by the production facility or office. Consequently, our county totals reflect business activity by facilities or offices located within the county. Those facilities typically transact business on properties located in other counties.
- [Question 11:](#) In Table 1, Column 3, Type of Title Order Transaction, can you clarify a little more about Type 4 by providing examples? Do you want us to report Guarantees and if so what report number would they fall under? Are these 5 categories intended to cover ALL our transactions?

- Question 12: We don't track business by the type of transaction categories sought by the Department in Table 1, Column 3 and are not able to report our title and escrow business by these categories.
- Question 13: In Column 4, Source of Title Order, do you mean you would like this report broken down by every customer that has opened an order with our underwritten title companies and then sort by County and Type? In some cases the customer has not been set up in our system so the user when opening an order uses NA (meaning it's a one time customer). To track the actual customer for every single order, additional administration would be required.
- Question 14: Do you want the Source of Business broken down by category – Realtors, For Sale by Owners, Mortgage Brokers, etc. – or do you want specific Brokers or Lenders identified?
- Question 15: We don't understand what you mean by source of business. We identify customers and not necessarily the source of the business.
- Question 16: We don't track source of business and cannot report the information requested in Column 4 of Table 1.
- Question 17: In Column 5, Affiliated Source, by affiliated, I am assuming that if the report is for XXXX Title Company and the order source was our sister YYYY Title Company then we would report a 1. Since XXXX Title Company and YYYY Title Company are under our umbrella company. Is this correct? If we receive an order from ZZZZ Title Company who uses the same underwriter as us but is not one of the companies under our umbrella company, we would report a 0. Is this correct?
- Question 18: In Table 1, Column 6, Title Orders Opened, I am interpreting this to be a line by line detail by Customer, by County, by Type and then a total. Is this correct? Also when you say Title Orders Opened? Do you mean total number of title orders opened that we processed in-house or total title orders opened including ones we would have out-sourced, since we don't insure in that county?
- Questions 19: In Table 1, Column 7, Title Orders Closed, and Column 8, Title Orders Canceled, same question as Question 18.
- Question 20: In Table 1, Column 9, Escrow Orders Opened, do you want line by line detail for escrow orders opened and not a total? Also if we receive an order that has Title and Escrow do we report it under Title Orders Opened and Escrow Orders Opened or only count it as one? And if so, under which Column?
- Questions 21: In Column 10, Escrow Orders Closed, and Column 11, Escrow Orders Canceled, same as Question 20.
- Question 22: In Table 1, when you refer to Title Orders Closed are you considering a title closed when the transaction records or when the title policy is issued? The reason I ask is we consider an escrow closed when the transaction records and disbursed so I would consider the title closed at that time but based on some of your correspondence it sounds like you are considering a title closed when the policy is issued. Could you please provide a more definitive answer?

Table 2

- Question 23: It is very difficult for us to report 2004 personnel expenses on an accrued basis. Can we report the expenses on a paid basis?
- Question 24: What do you mean by “Escrow Other Than Closing?”
- Question 25: The first request for supplemental information with Table 2 asks for an organizational chart for the California business of the title insurance company that identifies the activity categories that the title insurer uses. What activity categories are you referring to?
- Question 26: The second request for supplemental information with Table 2 asks for the total number of full-time equivalent workers – employees, temporary/contract workers and consultants – and the total personnel costs for that activity category for California business in 2004. What activity categories are you referring to?
- Question 27: The third request for supplemental information with Table 2 requests a description of the criteria and calculation of commissions and bonuses for individuals receiving a commission or bonus in California in 2004. Do you want a description for each individual receiving a commission or bonus or a general description of how commissions or bonuses are calculated? If you want a general description, how should we group employees for the general description?
- Question 28: Table 2, Supplemental Information Request 4 asks for a list of the agencies you use for temporary / contract workers and the major type of worker from that agency – administrative support, title, escrow, etc. – for California business. We don’t track our contract workers by what they do only by which agency we paid. We would have to perform a manual search to provide the requested information.

California Department of Insurance
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Issued August 22, 2005 and Revised September 15, 2005

Questions and Answers

Please review the following information to answer your questions about the underwritten title company data call. These questions and answers should be used in combination with the September 15, 2005 revision of the reporting instructions for the data call.

The questions and answers are organized in three categories – general instructions, Table 1 and Table 2.

General Instructions

Question 1: Can we get an extension? Will you extend the due date?

Response: In response to the discussions at the informational meetings on September 8, 2005 and subsequent communication with various underwritten title companies and title insurance companies, the Department is responding to concerns about both the difficulties in responding to the call in any time frame and the difficulty of responding by October 21 in a multi-pronged manner.

First, the Department has clarified a number of reporting issues raised by interested parties and these clarifications will simplify some of the reporting.

Second, the Department will allow underwritten title companies to respond to certain data requests as their individual electronic data capabilities currently allow. The Department will not require a reporting entity to manually review a large number of paper files to respond to the data call.

Third, the Department has created an alternative Table 1A in the underwritten title company data call for those underwritten title companies which are unable to report the information described in Table 1 issued on August 22, 2005.

Fourth, the Department repeats its invitation to any underwritten title company to propose an alternative reporting format that includes all the requested data but is easier for you to prepare. We cannot guarantee that the Department will accept a proposal for an alternative format, but we will quickly review any such proposal to determine if we can work with the data in the proposed alternative format.

Fifth, the Department has extended the due date for most of the requested information until December 8, 2005.

The specific due dates are now:

DUE October 21, 2005: Supplemental Information for Table 1 or Table 1A and Supplemental Information for Table 2

DUE December 8, 2005: Table 1 or Table 1A and Table 2

Please note that, based upon discussion with interested parties, the following tables and supplemental information requests have been modified, added or deleted. Please also note that while the information requested in some tables or supplemental information requests has not changed, the reporting instructions may have changed to provide more explanation or more reporting options. Please review the 9/15/05 revised reporting instructions carefully in combination with these questions and answers:

UTC Table 1	No Change
UTC Table 1, Supplemental Information 1	NEW
UTC Table 1, Supplemental Information 2	NEW
UTC Table 1A	NEW, Alternative to UTC Table 1
UTC Table 1A, Supplemental Information 1	NEW, Alternative to UTC Table 1
UTC Table 1A, Supplemental Information 2	NEW, Alternative to UTC Table 1
UTC Table 2	No Change
UTC Table 2, Supplemental Information 1	No Change
UTC Table 2, Supplemental Information 2	No Change
UTC Table 2, Supplemental Information 3	MODIFIED
UTC Table 2, Supplemental Information 4	MODIFIED
UTC Table 2, Supplemental Information 5	NEW

Sixth, if you feel that you cannot respond to the request for information by the due dates, the Department asks you to contact the Rate Specialist Bureau (rsb@insurance.ca.gov) to explain your particular problems and we will try to work with you to address those problems.

Question 2: Has the DOI adopted any regulations under Section 12414.21?

Response: Yes. The Commissioner has adopted regulations under section 12414.21. Those regulations can be found at: Title 10, California Code of Regulations (CCR) §§ 2555 - 2556.2.

Question 3: Isn't the adoption of rules or regulations under Section 12414.21 a prerequisite for a data call under that section?

Response: As indicated in the response to Question 2, such regulations have been adopted. Under these regulations, CCR §2556.2 gives the Commissioner the authority to examine the rates, charges, fees, rating plans, rating systems, underwriting rules or policy forms adopted and used by title entities. This includes the loss or expense experience and the data, statistics or information collected or used by such entities in determining or establishing the rates, charges, fees, rating plans, rating systems, underwriting rules or policy forms it uses.

Question 4: Prior to the data call did the DOI compile the information provided in the UTC annual audited financial reports submitted to the DOI?

Response: Yes.

Question 5: Why can't the DOI get the information it needs from the annual reports?

Response: The Department can and has obtained much information from the underwritten title company annual reports, as reflected in the lesser information request to underwritten title companies than to title insurers in the August 22, 2005 data calls. These data calls ask for information not previously reported in the underwritten title company annual reports or information for which the underwritten title company annual reports may not be reliable. If there are specific data items requested in the August 22, 2005 data calls, as revised on September 15, 2005, that duplicate the underwritten title company annual report, please let us know and we will consider a request to eliminate any duplication.

Question 6: Will the data submissions be treated as public information?

Response: No. The individual underwritten title company and individual title insurance company data submissions will be treated as non-public information. The Department may publish compilations of the data submissions in a manner that does not reveal information about individual companies.

Table 1

Question 7: On Table 1, are we to list each Title Order Transaction individually, or are we to state the total number of transactions? Are you looking for a summary of orders closed by Type i.e.. 500 residential resales or do you want a list of individual orders?

Response: To help explain how to report information in Table 1, let us assume that the UTC transacts business in two counties (Inyo and Mono) and has five sources of title and escrow orders (Sources A, B, C, D and E). This UTC would report a maximum of 50 records: 2 counties x 5 transaction types x 5 sources. The first record would be Inyo County (column 2), transaction type 1 (column 3) and source A (column 4). In column 5 of this record, you would report a 1 if the source was affiliated or 0 if not affiliated. Then in columns 6 through 11 you would report the sum of title orders opened, closed and cancelled and escrow orders opened, closed and cancelled for transaction type 1 from source A in Inyo County. The second record would be for Inyo County, transaction type 2 and source A. The [attached example](#) shows all fifty possible records. Finally, if there are no title or escrow orders for particular combinations of county, type and source – e.g., there were no title or escrow orders from source A in Inyo County 1 for transaction type 5 – there is no need to include this record because all the entries in columns 6 through 11 would be zero.

As the number of counties and number of sources increase, so do the maximum number of records. If you transact business in 25 counties with 100 sources, the maximum number of records is 25 x 5 x 100 or 12,500. The actual number of records would be less because all sources do not operate in all counties.

The Department does not seek a list of individual orders but asks for the sum of title and escrow orders for each combination of county, transaction type and source. However, if it is more convenient for you to report a list of individual orders than to provide the summary Table 1, please submit alternative Table 1A instead.

Question 8: In Table 1, Column 1, Name of UTC, does this mean you want us to report by our different underwritten title companies or by our underwriters?

Response: As this call is directed at underwritten title companies, please report separately by underwritten title company.

Question 9: In Table 1, Column 2, County, does this mean you want the activity for our branches that are located in a certain county or do you want you the report broken down by the County the property was located in?

Response: Please report by the county the property was located in.

List of Business Activity by Type and Source in 2004

	[1] Name of UTC	[2] County	[3] Type of Title Order Transaction	[4] Source of Title Order	[5] Affiliated Source	[6] Title Orders Opened	[7] Title Orders Closed	[8] Title Orders Cancelled	[9] Escrow Orders Opened	[10] Escrow Orders Closed	[11] Escrow Orders Cancelled
1	XYX Title Co	Inyo	1	A	0						
2	XYX Title Co	Inyo	2	A	0						
3	XYX Title Co	Inyo	3	A	0						
4	XYX Title Co	Inyo	4	A	0						
5	XYX Title Co	Inyo	5	A	0						
6	XYX Title Co	Mono	1	A	0						
7	XYX Title Co	Mono	2	A	0						
8	XYX Title Co	Mono	3	A	0						
9	XYX Title Co	Mono	4	A	0						
10	XYX Title Co	Mono	5	A	0						
11	XYX Title Co	Inyo	1	B	1						
12	XYX Title Co	Inyo	2	B	1						
13	XYX Title Co	Inyo	3	B	1						
14	XYX Title Co	Inyo	4	B	1						
15	XYX Title Co	Inyo	5	B	1						
16	XYX Title Co	Mono	1	B	1						
17	XYX Title Co	Mono	2	B	1						
18	XYX Title Co	Mono	3	B	1						
19	XYX Title Co	Mono	4	B	1						
20	XYX Title Co	Mono	5	B	1						
21	XYX Title Co	Inyo	1	C	1						
22	XYX Title Co	Inyo	2	C	1						
23	XYX Title Co	Inyo	3	C	1						
24	XYX Title Co	Inyo	4	C	1						
25	XYX Title Co	Inyo	5	C	1						
26	XYX Title Co	Mono	1	C	1						
27	XYX Title Co	Mono	2	C	1						
28	XYX Title Co	Mono	3	C	1						
29	XYX Title Co	Mono	4	C	1						
30	XYX Title Co	Mono	5	C	1						
31	XYX Title Co	Inyo	1	D	1						
32	XYX Title Co	Inyo	2	D	1						
33	XYX Title Co	Inyo	3	D	1						
34	XYX Title Co	Inyo	4	D	1						
35	XYX Title Co	Inyo	5	D	1						
36	XYX Title Co	Mono	1	D	1						
37	XYX Title Co	Mono	2	D	1						
38	XYX Title Co	Mono	3	D	1						
39	XYX Title Co	Mono	4	D	1						
40	XYX Title Co	Mono	5	D	1						
41	XYX Title Co	Inyo	1	E	0						
42	XYX Title Co	Inyo	2	E	0						
43	XYX Title Co	Inyo	3	E	0						
44	XYX Title Co	Inyo	4	E	0						
45	XYX Title Co	Inyo	5	E	0						
46	XYX Title Co	Mono	1	E	0						
47	XYX Title Co	Mono	2	E	0						
48	XYX Title Co	Mono	3	E	0						
49	XYX Title Co	Mono	4	E	0						
50	XYX Title Co	Mono	5	E	0						

Question 10: The Department indicates that in Table 1, Column 2, "County," refers to the county in which the property, that is the subject of the title search or escrow, is located. We do not track this information. We track our title and escrow orders by the production facility or office. Consequently, our county totals reflect business activity by facilities or offices located within the county. Those facilities typically transact business on properties located in other counties.

Response: For underwritten title companies which are able to report activity by county according to the location of the property, please report Table 1 as originally issued by the Department on August 22, 2005. For underwritten title companies which are NOT able to report activity by county according to the location of the property, such as the underwritten title company posing this question, please report alternative Table 1A instead of Table 1.

Question 11: In Table 1, Column 3, Type of Title Order Transaction, can you clarify a little more about Type 4 by providing examples? Do you want us to report Guarantees and if so what report number would they fall under? Are these 5 categories intended to cover ALL our transactions?

Response: The five (5) categories are intended to cover all types of transactions, where "type of transaction" refers to the type of property – residential, commercial or industrial. An example of type 4 – any other residential – might be a multi-unit apartment or condominium that is not categorized as a commercial transaction.

We understand that a Guarantee is issued on the basis of a title examination and, consequently, the issuance of a Guarantee would be associated with opening a title order. On the basis of this understanding, please include Guarantees and place them in the appropriate category depending upon the type of property transaction – residential (types 1, 2, 3 or 4) or commercial and industrial (type 5). If our understanding of a Guarantee is incorrect, please let us know.

Question 12: We don't track business by the type of transaction categories sought by the Department in Table 1, Column 3 and are not able to report our title and escrow business by these categories.

Response: Please report Table 1, Column 3 categories to the extent that you are able to distinguish between residential resales, new residential sales, residential refinance and commercial / industrial and to the extent this information is reasonably available in a computer database available to the underwritten title company. If you are unable to provide the breakout requested in Table 1, Column 3, please report Alternative Table 1A instead of Table 1.

Question 13: In Column 4, Source of Title Order, do you mean you would like this report broken down by every customer that has opened an order with our underwritten title companies and then sort by County and Type? In some cases the customer has not been set up in our system so the user when opening an order uses NA (meaning it's a one time customer). To track the actual customer for every single order, additional administration would be required.

Response: California Insurance Code §12397 and §12397.5 provide the following for title insurers and underwritten title companies:

12397. Any applicant for a license shall indicate the applicant's intent to actively compete in the marketplace for title insurance in each county in which the applicant seeks to or does conduct the business of title insurance. The failure to so indicate shall constitute grounds for denial of the license. Each applicant for a license shall also demonstrate that its plan of operation and intended course of business conduct will not involve reliance for more than 50 percent of its closed title orders from controlled business sources.

12397.5 (a) Each licensee shall make submissions as are required by the Department of Insurance to enable the department to determine the nature and extent of the licensee's efforts to actively compete in each county in which it transacts its business. The licensee shall maintain records of its title orders sufficient to indicate the source of the title orders.

First, the source of business refers to the entity referring the ultimate consumer to the underwritten title company or controlled escrow company. The ultimate consumer is the person buying, selling or refinancing the property and is the person paying for the title insurance and escrow services. The source of business will typically be a real estate agent, lender, mortgage broker, homebuilder / developer or independent escrow company. In some instances, the source of business is the ultimate consumer – a “walk-in.”

Second, for “one-time customers,” as you have described them, please enter “Individuals” in Column 4. Please note, however, that you will need to identify and separate “Individuals” that are a controlled business source from those that are not, in combination with an entry in Column 5. Assuming that you had some “one-time customers” that were controlled business sources, you would have two records – one of “Individuals” who are not controlled business sources and one for “Individuals” who are.

Question 14: Do you want the Source of Business broken down by category – Realtors, For Sale by Owners, Mortgage Brokers, etc. – or do you want specific Brokers or Lenders identified?

Response: Please report the specific name of the source of the business with sufficient detail to identify the nature of the source, to the extent you have this information available in your electronic database. For example, please report “Joe Smith Realty” as opposed to “Joe Smith.”

Question 15: We don’t understand what you mean by source of business. We identify customers and not necessarily the source of the business.

Response: If, by “customers,” you mean generally the entity referring the business to you, and if you track customers, instead of source of business, please report customers in Column 4.

Question 16: We don’t track source of business and cannot report the information requested in Column 4 of Table 1.

Response: For underwritten title companies which are able to report activity by source, please report Table 1 as originally issued by the Department on August 22, 2005. For underwritten title companies which are NOT able to report activity by source according to the location of the property, such as the underwritten title company posing this question, please report alternative Table 1A instead of Table 1.

Question 17: In Column 5, Affiliated Source, by affiliated, I am assuming that if the report is for XXXX Title Company and the order source was our sister YYYY Title Company then we would report a 1. Since XXXX Title Company and YYYY Title Company are under our umbrella company. Is this correct? If we receive an order from ZZZZ Title Company who uses the same underwriter as us but is not one of the companies under our umbrella company, we would report a 0. Is this correct?

Response: We again refer to the California Insurance Code, which states:

12396. (a) For purposes of this article, "controlled business source" means an affiliate, as defined in subdivision (a) of Section 1215, of any title insurer, controlled escrow company, or underwritten title company.

Report a “1” in Column 5 for any business source that meets the definition of “controlled business source” in the California Insurance Code § 12396 (a).

Question 18: In Table 1, Column 6, Title Orders Opened, I am interpreting this to be a line by line detail by Customer, by County, by Type and then a total. Is this correct? Also when you say Title Orders Opened? Do you mean total number of title orders opened that we processed in-house or total title orders opened including ones we would have out-sourced, since we don't insure in that county?

Response: In response to the second part of your question, please report all title orders opened, including ones you have out-sourced.

In response to the first part of your question, please see the response to question 7 above.

Questions 19: In Table 1, Column 7, Title Orders Closed, and Column 8, Title Orders Canceled, same question as Question 18.

Response: Please see our response to Question 18.

Question 20: In Table 1, Column 9, Escrow Orders Opened, do you want line by line detail for escrow orders opened and not a total? Also if we receive an order that has Title and Escrow do we report it under Title Orders Opened and Escrow Orders Opened or only count it as one? And if so, under which Column?

Response: Please count title and escrow activity separately. For example, if you have 10 title-only orders, 15 combined title and escrow orders and 7 escrow-only orders, you would have 25 title orders (10+ 15) and 22 escrow orders (15 + 7). Please break out your escrow orders in the same manner described for title orders in our response to Question 7.

For some combinations of UTC, County, Type of Transaction and Source of Title Order, you will have entries in both title and escrow columns. For other combinations of UTC, County, Type of Transaction and Source of Title Order, you may have only entries in the title columns or only entries in the escrow columns.

Questions 21: In Column 10, Escrow Orders Closed, and Column 11, Escrow Orders Canceled, same as Question 20.

Response: Please see our response to Question 20.

Question 22: In Table 1, when you refer to Title Orders Closed are you considering a title closed when the transaction records or when the title policy is issued? The reason I ask is we consider an escrow closed when the transaction records and disbursed so I would consider the title closed at that time but based on some of your correspondence it sounds like you are considering a title closed when the policy is issued. Could you please provide a more definitive answer?

Response: Please report title and escrow orders opened, closed and canceled as you consider them opened, closed and canceled in your normal course of business. To help the Department understand how different underwritten title companies consider orders opened, closed and canceled, we are adding the following supplemental information requests to Table 1:

1. Please identify the specific events that cause you to consider a title order opened, closed and canceled and the specific events that cause you to consider an escrow order opened, closed and canceled.

Table 2

Question 23: It is very difficult for us to report 2004 personnel expenses on an accrued basis. Can we report the expenses on a paid basis?

Response: Yes. The Department has modified the instructions to allow reporting on either a paid or accrued basis. The Department has added Supplemental Information Request 5 for Table 2 for the underwritten title company to indicate the basis of Table 2 reporting.

Question 24: What do you mean by “Escrow Other Than Closing?”

Response: For some larger underwritten title companies, escrow activities may be broken out into closing and other escrow activities. If that is the case, please use the “Escrow Other Than Closing” category for the other escrow activities. If you consider all your escrow activity to be closing-related, leave the “Escrow Other Than Closing” category blank.

Question 25: The first request for supplemental information with Table 2 asks for an organizational chart for the California business of the title insurance company that identifies the activity categories that the underwritten title company uses. What activity categories are you referring to?

Response: For this supplemental information request, activity categories are the boxes on your organizational chart. The Department seeks an organizational chart of your underwritten title company. “Activity categories” simply refers to how you organize your title insurance company and does not mean the activity categories used for Table 2 itself.

Question 26: The second request for supplemental information with Table 2 asks for the total number of full-time equivalent workers – employees, temporary/contract workers and consultants – and the total personnel costs for that activity category for California business in 2004. What activity categories are you referring to?

Response: As with the response to question 25, the reference to “activity categories” in the supplemental request for information is to those activity categories identified in your organizational chart and not to the activity categories used for Table 2.

Question 27: The third request for supplemental information with Table 2 requests a description of the criteria and calculation of commissions and bonuses for individuals receiving a commission or bonus in California in 2004. Do you want a description for each individual receiving a commission or bonus or a general description of how commissions or bonuses are calculated? If you want a general description, how should we group employees for the general description?

Response: Based upon the discussion in the informational meetings on September 8, 2005 and on follow-up communications with interested parties, the Department has revised the Supplemental Information Request 3 for ease of reporting and clarity. The revised supplemental request is:

For each of the highest paid workers in your underwritten title company, please provide:

- Position Title
- Salary for 2004
- Commission for 2004
- Bonus for 2004
- Benefits for 2004
- Consulting Contract for 2004
- Value of Stock Options for 2004
- Dividends Paid for 2004 if Owner
- Complete description of the criteria and calculation of commission and bonus

The number of employees reported depends on the amount of 2004 gross title premium for your underwritten title company:

Less than \$3 million, report the 2 highest paid workers
\$3 million to \$10 million, report the 3 highest paid workers
\$10 million to \$30 million, report the 5 highest paid workers
\$30million to \$50 million, report the 7 highest paid workers
\$50 million to \$100 million, report the 10 highest paid workers
\$100 million to \$300 million, report the 15 highest paid workers
More than \$300 million, report the 20 highest paid workers

Question 28: Table 2, Supplemental Information Request 4 asks for a list of the agencies you use for temporary / contract workers and the major type of worker from that agency – administrative support, title, escrow, etc. – for California business. We don't track our contract workers by what they do only by which agency we paid. We would have to perform a manual search to provide the requested information.

Response: Based upon the discussion in the informational meetings on September 8, 2005 and on follow-up communications with interested parties, the Department has revised Supplemental Information Request 4 for Table 2 to eliminate any information on type of workers. Revised Supplemental Information Request 4 is:

Please provide a list of the names of agencies you use for temporary / contract workers and the amount paid to each of those agencies for such workers in 2004.